

EXHIBIT A

PLAINTIFF'S PROPOSED CLAIM CONSTRUCTIONS AND EVIDENCE

Term	Plaintiff's Proposed Construction	Preliminary Identification of Intrinsic and Extrinsic Evidence
automatic data processing	performing based on conditions or status other than just the last user entry	<p>The specification of the '319 Patent, including 1:63-65 and Figure 1.</p> <p>The prosecution history of the '319 Patent, including the September 19, 1995 Amendment at 7-10; the March 7, 1996 Amendment at 2; and the June 27, 1996 Appeal Brief at 1.</p> <p>IBM Dictionary of Computing, George McDaniel, International Edition (1994), at pages 43 and 72.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>
business and financial transactions	No construction necessary / Plain and ordinary meaning	The specification of the '319 Patent, including the Abstract; 1:19-2:9; 5:53-67; and Figures 1, 3-5.

		<p>The prosecution history of the ‘319 Patent, including the September 19, 1995 Amendment at 6-10 and the June 27, 1996 Appeal Brief at 31-32.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
a central processor	<p>a computational platform capable of communicating with the claimed terminal, and whose hardware architecture and components are arranged such that the combination of at least modem 15, DMA unit 16, video screen 18, videodisc 14, RAM memory 17, and data processor 13 are arranged as disclosed in Figure 2 such that the DMA is placed along a second information handling connection independent of the first such connection, so that the DMA may place information</p>	<p>The specification of the ‘319 Patent, including the Abstract; 2:25-49; 3:6-29; and Figures 1-2.</p> <p>The prosecution history of the ‘319 Patent, including the September 19, 1995 Amendment at 7-11; the June 27, 1996 Appeal Brief at 24-33; the December 12, 1996 Reply Brief at 1-7; and the September 27, 2000 Board Decision at 8-9.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16.</p>

	<p>directly into memory without traversing the first connection, and the video playback and communication systems may operate concurrently, and all equivalents thereto.</p>	<p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>
Means for receiving information	<p><u>Function:</u> receiving information</p> <p><u>Structure:</u> the communication control unit 6 capable of communicating with the claimed terminal via a telephone line or other means of telecommunication, and all equivalents thereto, including interim physical layers and protocols (i.e., 3G, 4G, LTE and WiFi) which reach the internet.</p>	<p>The specification of the '319 Patent, including the Abstract; 2:24-49; 3:6-29; and Figures 1-2.</p> <p>The prosecution history of the '319 Patent, including the September 19, 1995 Amendment at 7-11; the June 27, 1996 Appeal Brief at 24-33; the December 12, 1996 Reply Brief at 1-7; and the September 27, 2000 Board Decision at 8-9.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
terminal	a unit in a system or communication network at which data may enter or leave, including the combination of at least modem 15, DMA unit 16, video screen 18,	<p>The specification of the '319 Patent, including the Abstract, 1:17-60; 1:65-2:46, 3:6-5:52 and Figures 1-5.</p> <p>The prosecution history of the '319 Patent, including the September 19, 1995 Amendment</p>

	<p>videodisc 14, RAM memory 17, and data processor 13, whose hardware architecture and components are arranged as in Figure 2 such that the DMA is placed along a second information handling connection independent of the first such connection, so that the DMA may place information directly into memory without traversing the first connection, and the video playback and communication systems may operate concurrently, and all equivalents thereto.</p>	<p>at 6-10; the March 7, 1996 Amendment at 2-17; and the June 27, 1996 Appeal Brief at 3-33.</p> <p>IBM Dictionary of Computing, George McDaniel, International Edition (1994), at page 686.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14, and the June 6, 2006 Notice of Intent at 2; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35 and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>
Means for remotely linking said terminal to said central processor	<p><u>Function</u>: remotely linking said terminal to said central processor</p> <p><u>Structure</u>: the combination of at least the modem 15, DMA unit 16, and data processor 13, organized in the terminal as disclosed in Figure 2, and linked to a central processor via a telephone line or other means of telecommunication,</p>	<p>The specification of the '319 Patent, including the Abstract; 2:24-27; 3:39-44; 4:21-26; 4:63-66; and Figure 2.</p> <p>The prosecution history of the '319 Patent, including the March 7, 1996 Amendment at 4-5; and the June 27, 1996 Appeal Brief at 6-7.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the</p>

	and all equivalents thereto, including interim physical layers and protocols (i.e., 3G, 4G, LTE and WiFi) which reach the internet	December 18, 2012 Notice of Intent at 4-16. All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.
A video screen	No construction necessary / Plain and ordinary meaning	The specification of the ‘319 Patent, including the Abstract; 3:50-61; 4:3-6; 5:1; 5:58-61; Figure 2. The prosecution history of the ‘319 Patent, including the June 27, 1996 Appeal Brief at 32. <i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 18, 2012 Notice of Intent at 4-16. All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.
Means for holding operational data	<u>Function</u> : holding operational data <u>Structure</u> : the videodisc 14, and all equivalents thereto, including hard disk drives and solid state drives.	The specification of the ‘319 Patent, including the Abstract; 3:34-39; 4:3-8; 4:10-15. The prosecution history of the ‘319 Patent, including the September 19, 1995 Amendment at 6, 8-9; March 7, 1996 Amendment at 3-4; the June 27, 1996 Appeal Brief at 5-6 and 32; and the December 12, 1996 Reply Brief at 6.

		<p>IBM Dictionary of Computing, George McDaniel, International Edition (1994)</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10- 14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>
means for manually entering information	<p><u>Function</u>: manually entering information</p> <p><u>Structure</u>: a keyboard or touchpad, and all equivalents thereto.</p>	<p>The specification of the '319 Patent, including 3:54-59; 4:10-18; 5:13-16; 5:46-48 and Figures 2-5.</p> <p>The prosecution history of the '319 Patent, including the including the September 19, 1995 Amendment at 7 and the June 27, 1996 Appeal Brief at 8 and 26.</p> <p>IBM Dictionary of Computing, George McDaniel, International Edition (1994), at pages 369 and 371.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10- 14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22,</p>

		<p>25, and 33-35 and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
means for storing information, [inquires] <i>inquiries</i> and orders for said transactions entered by one of said entities via said means for manually entering information, and data received through and from said central processor;	<p><u>Function:</u> storing information, inquiries and orders for transactions entered by an entity via said means for manually entering information, and data received through and from said central processor</p> <p><u>Structure:</u> the videodisc 14, and all equivalents thereto, including hard disk drives and solid state drives.</p>	<p>The specification of the '319 Patent, including the Abstract; 3:34-39; 4:3-8; 4:10-15.</p> <p>The prosecution history of the '319 Patent, including the September 19, 1995 Amendment at 6, 8-9; March 7, 1996 Amendment at 4; the June 27, 1996 Appeal Brief at 6 and 32; and the December 12, 1996 Reply Brief at 6.</p> <p>IBM Dictionary of Computing, George McDaniel, International Edition (1994) at 420 and 732.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35 and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>

<p>on-line means for transmitting [said information, inquiries, and orders to said central processor]</p>	<p><u>Function:</u> transmitting said information, inquiries, and orders to said central processor;</p> <p><u>Structure:</u> the combination of at least the modem 15, DMA unit 16, video disc 14, and data processor 13, organized in a computerized terminal as disclosed in Figure 2, equipped with software for transmitting information, inquiries, and orders to the central processor via a telephone line or other means of telecommunication, and all equivalents thereto, including interim physical layers and protocols (i.e., 3G, 4G, LTE and WiFi) which reach the internet.</p>	<p>The specification of the ‘319 Patent, including the Abstract; 2:24-28; 3:39-44; 4:21-26; 4:63-66; Figure 2.</p> <p>The prosecution history of the ‘319 Patent, including the March 7, 1996 Amendment at 4-5; and the June 27, 1996 Appeal Brief at 6-7.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
<p>on-line means for receiving [data comprising operator-selected information and orders from said central processor via said linking means]</p>	<p><u>Function:</u> receiving data comprising operator-selected information and orders from said central processor via said linking means</p> <p><u>Structure:</u> the combination of at least the modem 15, DMA unit 16, video disc 14, and data processor 13, organized in the terminal as disclosed in Figure 2, equipped with software for receiving</p>	<p>The specification of the ‘319 Patent, including the Abstract; 2:24-28; 3:39-43; 4:21-26; 4:63-66; Figure 2.</p> <p>The prosecution history of the ‘319 Patent, including the March 7, 1996 Amendment at 4-5; and the June 27, 1996 Appeal Brief at 6-7.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22,</p>

	operator-selected information and orders from a central processor via a telephone line or other means of telecommunication, and all equivalents thereto, including interim physical layers and protocols (i.e., 3G, 4G, LTE and WiFi) which reach the internet.	25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16. All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.
Means for outputting said informing and inquiring sequences on said video screen	<u>Function:</u> outputting said informing and inquiring sequences on said video screen <u>Structure:</u> the combination of at least data processor 13 and video screen 18, equipped with software for outputting informing and inquiring sequences, and all equivalents thereto.	The specification of the '319 Patent, including 3:34-39; 3:50-61; 4:10-18; 4:54-60; 5:44-52; 6:1-5; claim 13; <i>see also</i> Figures 2-5 and 3:66-5:35. The prosecution history of the '319 Patent, including the September 19, 1995 Amendment at 7-10; March 7, 1996 Amendment at 5-6; and the June 27, 1996 Appeal Brief at 8-9. <i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35, and the December 18, 2012 Notice of Intent at 4-16. All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.
In response to data entered through said means for entering information	No construction necessary / Plain and ordinary meaning	The specification of the '319 Patent, including 3:34-39; 3:50-61;

		<p>4:10-18; 4:54-60; 5:44-52; <i>see also</i> Figures 2-5 and 3:66-5:35.</p> <p>The prosecution history of the ‘319 Patent, including the September 19, 1995 Amendment at 7-10; and the March 7, 1996 Amendment at 5-6.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14, and the June 6, 2006 Notice of Intent at 2; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35 and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
means for controlling said means for storing, means for outputting, and means for transmitting, including means for fetching additional inquiring sequences in response to a plurality of said data entered through said means for entering and in response to information received from said central processor	<p><u>Function:</u> controlling means for storing, means for outputting, and means for transmitting, including means for fetching additional inquiring sequences in response to a plurality of said data entered through said means for entering and in response to information received from said central processor.</p> <p><u>Structure:</u> a computerized terminal including the combination of at least</p>	<p>The specification of the ‘319 Patent, including 2:7-9; 2:46-57; 3:30-49; 4:19-21; 4:33-60; 4:54-60; 4:66-5:3; 5:37-52; 3:66-5:35 and Figures 2-5.</p> <p>The prosecution history of the ‘319 Patent, including the September 19, 1995 Amendment at 7-10; March 7, 1996 Amendment at 6-8; and the June 27, 1996 Appeal Brief at 9-12; the December 12, 1996 Reply Brief at 4-6; and the September 27, 2000 Board Decision at 8-9.</p> <p>IBM Dictionary of Computing, George McDaniel, International Edition (1994), at pages 143 and 265</p>

	<p>modem 15, DMA unit 16, video screen 18, videodisc 14, RAM memory 17, and data processor 13, whose hardware architecture and components are arranged as in Figure 2 such that the DMA is placed along a second information handling connection independent of the first such connection, so that the DMA may place information directly into memory without traversing the first connection, and the video playback and communication systems may operate concurrently, equipped with software implementing the algorithms disclosed at 5:37-46, 1:62-2:9, 3:6-29, 3:39-44, 3:66-5:35, and Figures 3-5, and all equivalents thereto.</p>	<p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14, and the June 6, 2006 Notice of Intent at 2; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35 and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>
Sequences including directions	No construction necessary / Plain and ordinary meaning	<p>The specification of the '319 Patent, including the Abstract; 3:34-39; 4:6-13; 4:33-60, and 6:1-5; <i>see also</i> claim 13.</p> <p>The prosecution history of the '319 Patent, including the September 19, 1995 amendment at 6; March 7, 1996 Amendment at 8-9; and the June 27, 1996 Amendment at 12-13.</p>

		<p>IBM Dictionary of Computing, George McDaniel, International Edition (1994), at page 346.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 12.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
Interrelated segments	No construction necessary / Plain and ordinary meaning	<p>The specification of the '319 Patent, including the Abstract; 3:34-39; 4:6-13; 4:33-60; and 6:1-5; <i>see also</i> claim 13.</p> <p>The prosecution history of the '319 Patent, including the March 7, 1996 Amendment at 8-9; and the June 27, Amendment at 12-13.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 12.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p>
means for interactively controlling the operation of said video screen, data receiving and transmitting means	<p><u>Function:</u> interactively controlling the operation of said video screen, data receiving and transmitting means; and selectively retrieving said data from said means for storing</p> <p><u>Structure:</u> a</p>	<p>The specification of the '319 Patent, including 2:7-9; 3:30-49; 4:33-60; 4:54-67; 4:66-5:3; 5:44-52; 3:66-5:35; and Figures 2-5.</p> <p>The prosecution history of the '319 Patent, including the September 19, 1995 Amendment at 7-10; March 7, 1996 Amendment at 9-10; and the June 27, 1996 Appeal Brief at 13.</p>

	<p>computerized terminal including the combination of at least modem 15, DMA unit 16, video screen 18, videodisc 14, RAM memory 17, and data processor 13, whose hardware architecture and components are arranged as in Figure 2 such that the DMA is placed along a second information handling connection independent of the first such connection, so that the DMA may place information directly into memory without traversing the first connection, and the video playback and communication systems may operate concurrently, equipped with software for interactively controlling the operation of the video screen and the data receiving and transmitting means, implementing the algorithms disclosed at 5:37-46, 1:62-2:9, 3:6-29, 3:39-44, 3:66-5:35 and Figures 3-5, and all equivalents thereto.</p>	<p>IBM Dictionary of Computing, George McDaniel, International Edition (1994), at page 143.</p> <p><i>Ex Parte</i> Reexamination No. 90/006,623, including the July 18, 2005 Amendment at 6-8 and 10-14, and the June 6, 2006 Notice of Intent at 2; and <i>Ex Parte</i> Reexamination No. 90/012,641, including the December 6, 2012 Order at 21-22, 25, and 33-35 and the December 18, 2012 Notice of Intent at 4-16.</p> <p>All prior art references cited during prosecution and subsequent <i>ex parte</i> reexamination proceedings, including U.S. Pat. Nos. 4,300,040; 4,359,631; 4,567,359; and RE32,115.</p> <p>The declarations of Landmark's expert, Joey Maitra, executed January 6, 2017 and October 15, 2019.</p>
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